1.4 Related Department of Energy Initiatives at the Hanford Site

Recent DOE management initiatives have provided a framework for alternatives being evaluated in this EIS. These initiatives are summarized in the following sections; additional information is provided in Appendix N.

1.4.1 EM Top-to-Bottom Review

In 2001, DOE reviewed its efforts to clean up 114 sites nationwide that are managed as part of DOE's Environmental Management Program (DOE 2002a). Cleanup of 74 of those sites is complete, and cleanup efforts at other sites are well underway. However, costs and schedules for the more extensive cleanup efforts, including Hanford, were expected to increase unless there were major changes in the way cleanup work was being managed. That review, referred as the Top-to-Bottom Review, was intended to identify problems and recommend improvements to accelerate cleanup, reduce risks, and reduce costs.

The review concluded that DOE's emphasis was on managing risks to people and the environment rather than reducing those risks. The review identified 12 issues and related recommendations, some of which could change current plans for managing waste at Hanford if they are implemented. Some of the recommendations made in the Top-to-Bottom Review could be implemented immediately. Some, including the possible changes to waste management activities at Hanford, would require additional planning. Prior to implementation of any of the recommendations, appropriate environmental documentation would be prepared.

1.4.2 DOE Cost Report

In 2002, DOE prepared a life-cycle cost analysis addressing the disposal of DOE's low-level waste (DOE 2002e). Life-cycle disposal costs include those related to transportation, disposal, closure, and long-term stewardship. The report discussed facilities for the disposal of LLW from cleanup actions under CERCLA (e.g., the Environmental Restoration Disposal Facility) as well as facilities used for other LLW disposal (e.g., the LLBGs). The report was prepared to address congressional concerns regarding the cost of LLW disposal, the extent to which DOE fee structures reflect actual life-cycle costs, and the impact of DOE disposal facilities on commercial LLW disposal.

The report concluded that pre-disposal costs, such as packaging and transportation, offer the greatest opportunity for cost savings. DOE disposal facilities established for CERCLA cleanup actions typically had the lowest life-cycle disposal costs per unit of waste because of the nature of wastes disposed of at those facilities. Commercial facilities may be more cost-effective for some types of waste; however, DOE facilities provide services that are not available at commercial facilities. In general, the report recommended that all elements of life-cycle costs in addition to disposal fees be considered in making decisions regarding LLW disposal.

1.4.3 Cleanup, Constraints, and Challenges Team (C3T)

In 2001, the DOE Richland Operations Office (DOE-RL), its contractors, EPA, and Ecology began a series of discussions to better identify, characterize, and resolve constraints and barriers to Hanford cleanup. These discussions, referred to as the Cleanup, Constraints, and Challenges Team (C3T) process, are designed to be an informal forum where ideas and concepts could be discussed openly. Ideas are developed and evaluated to determine whether they could accelerate cleanup; reduce costs; or protect workers, the public, and the environment. The C3T process is not intended to replace legal or regulatory requirements, or to change formal commitments such as the TPA. Some concepts identified during the C3T process might be suitable for immediate implementation. However, most would probably require further planning, changes to existing permits and TPA Milestones, changes to existing contracts, and preparation of additional NEPA or CERCLA reviews. Additional information can be found in Appendix N and at http://www.hanford.gov/docs/rl-2002-65. rl-2002-65.pdf.

1.4.4 Hanford Performance Management Plan (HPMP)

Drawing on recommendations contained in the Top-to-Bottom Review and from ideas emerging from the C3T process (DOE-RL 2002a), a plan was prepared to accelerate cleanup at Hanford (DOE-RL 2002b). The plan describes higher-level strategic initiatives as well as specific goals for completing Hanford cleanup by 2035, which is 35 years earlier than previously planned.

Some of the acceleration activities described in the HPMP could be implemented immediately. Others could be implemented as a result of reviews performed under this HSW EIS. Some, however, would require further planning, changes to existing permits and TPA milestones, and preparation of additional NEPA or CERCLA reviews. Implementation of some of the accelerated cleanup proposals is discussed in Section 3. However, the plans and schedules associated with many HPMP proposals were not sufficiently well developed for detailed analysis at the time this EIS was prepared. Therefore, the analyses of environmental impacts presented in Section 5 do not necessarily reflect all activities, or the timing of some activities, as described in the HPMP.

1.5 Relationship of the HSW EIS to Other Hanford and DOE NEPA Documents

A number of other DOE programmatic and Hanford actions are related to this HSW EIS. The relationships of these actions and associated NEPA documents to the HSW EIS are described in the following sections and were illustrated previously in Figure 1.2.

1.5.1 Interim Actions During Preparation of the Draft HSW EIS

During the preparation of the draft HSW EIS, DOE determined that several actions within or related to the scope of the EIS met the criteria for permissible interim actions under 40 CFR 1506.1. These actions are described in the following documents: